

IN THE UNITED STATE DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

GRAHAM YATES and BECKY  
YATES,

Plaintiffs,

v.

AIR & LIQUID SYSTEMS  
CORPORATION, et al.,

Defendants.

Civil Action No. 5:12-cv-00752-FL

**FORD’S MOTION TO STRIKE, MOTION TO QUASH OR ENTER PROTECTIVE  
ORDER, AND MOTION FOR RECONSIDERATION OF ORDER AT D.E. 423**

Pursuant to Federal Rules of Civil Procedure 16, 26, 37, 45, and 60, Defendant Ford Motor Company (“Ford”) hereby moves to strike Plaintiffs’ amended pre-trial disclosures, to quash or enter a protective order against Plaintiffs’ newly-issued subpoena to Dennis Paustenbach, and for reconsideration of its Order at D.E. 423 denying Ford’s motion to quash/motion for protective order from Plaintiffs’ previously-issued subpoenas to Richard Schlenker, Mark Garavaglia, and Patrick Sheehan for the reasons set forth in its contemporaneously-filed Memorandum In Support.

This the 12th day of June, 2015.

SMITH, ANDERSON, BLOUNT, DORSETT,  
MITCHELL & JERNIGAN, L.L.P.

By: /s/ Addie K.S. Ries  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on June 12, 2015, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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